

MORRISON COHEN LLP

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*Attorneys for Dennis Black and Charles Cunningham,
-and-
Blue Cross Blue Shield of Michigan*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11
	:
DELPHI CORPORATION, et al.,	:
	: Case No. 05-44481 (RDD)
Debtors.	:
	: (Jointly Administered)
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**MORRISON COHEN LLP'S AMENDED
VERIFIED RULE 2019 STATEMENT**

The law firm of Morrison Cohen LLP ("MC") files this Amended Statement of Multiple Representation, pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure ("Statement"), and respectfully sets forth as follows:

1. MC is a law firm representing the following parties ("Parties") with respect to the chapter 11 cases of the above-captioned debtors ("Debtors"):

a. Blue Cross Blue Shield of Michigan
600 Lafayette East #1925
Detroit, Michigan 48226-299

b. Dennis Black
416 Willow Brook Way
Chesapeake, VA 23320-3560

c. Charles Cunningham
8835 Stoneridge Dr., SE
Warren, Ohio 44484

2. The Parties listed above either (a) hold claims against the Debtors, or (b) are parties to certain agreements with the Debtors that may be affected by the Debtors' chapter 11 cases.

3. Blue Cross Blue Shield of Michigan ("Blue Cross") is the pre-petition and post-petition provider of certain health care benefits and/or services to the Debtors and their employees. Throughout this case, Blue Cross has been paid in full for all of the services and benefits provided to the Debtors. Moreover, Blue Cross anticipates that it will continue to be paid, within the ordinary course of business, throughout the remainder of this case. To that extent, Blue Cross does not have a claim against the Debtors at this time. However, Blue Cross has filed proofs of claim herein in an abundance of caution to preserve its rights to be paid on any claims that may arise in the future, or which exist at this time but are unknown.

4. Dennis Black and Charles Cunningham (collectively, "Salaried Workers") are intervening parties¹ in connection with the Debtors' proposed modifications to the First Amended Plan of Reorganization, dated June 1, 2009 ("Proposed Modified Plan"). Specifically, the Proposed Modified Plan references a recent agreement with the Pension Benefit Guaranty Corporation ("PBGC"), which – when effectuated – will result in the termination of the Delphi Retirement Program for Salaried Employees ("Salaried Workers Plan"). For this reason, the Salaried Workers have filed an Objection to the Proposed Modified Plan. The Salaried Workers interests are aligned in this matter and have each agreed to MC representing them jointly herein.

¹ The Salaried Workers filed a motion, dated July 15, 2009, to intervene in this case ("Motion") in an abundance of caution to the extent that they would not be considered an "Interested Party" under the Bankruptcy Code. That motion was approved at the Court's hearing on the Motion on July 23, 2009. An Order approving the Motion will be presented to the Court for signature at the emergency hearing on the Debtors' Emergency Automatic Stay Enforcement Motion, dated July 22, 2009.

5. MC was approached by Blue Cross and the Salaried Workers separately, who separately asked MC to act for them in these chapter 11 cases. MC will continue to represent these parties separately and individually in matters related to the Debtors' chapter 11 cases. MC may similarly undertake additional representations of additional parties and to the extent MC does so, this Statement will be amended as appropriate.

6. MC reserves the right to further supplement or amend this Statement.

Dated: New York, New York
July 24, 2009

MORRISON COHEN LLP

By: /s/ Joseph T. Moldovan
Joseph T. Moldovan
Michael R. Dal Lago
909 Third Avenue
New York, New York 10022
(212) 735-8600

I, Joseph T. Moldovan, verify under penalty of perjury that the foregoing statements are true and correct to the best of my information, knowledge and belief.

/s/ Joseph T. Moldovan
JOSEPH T. MOLDOVAN